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March 13, 2023

VIA ELECTRONIC FILING

Honorable John Koeltl
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

APPLICATION GRANTED
SO ORDERED

3/16/22 *Dr G Koeltl*
John G. Koeltl, U.S.D.J.

Re: US v. Herrera 21 Cr. 680 (JGK)

Dear Judge Koeltl:

Counsel for Steven Herrera respectfully submits this letter to request permission to pick up and drop off his two (2) daughters from school for the next two (2) weeks. The schools are located at 610 Henry Street, Brooklyn NY and 54 Saint Edward Street, Brooklyn, NY.

Mr. Herrera shares custody of his kids with the mother of the children and she is scheduled to have surgery on _____ and will not be able to perform her usually pick up and drop off duties. Mr. Herrera respectfully requests permission to drop of and pick up his children

It is my understanding that Pretrial Services, through Officer Marlon Ovalles, unable to consent to this request due to the fact that it is against office policy for additional travel while on home incarceration. However, Pretrial states that Mr. Herrera remains in full compliance with the conditions of his release. Additionally, the Government, through Assistant US Attorney Kaylan Lasky defers to pretrials.

Our office believes Mr. Herrera should be granted his travel request over Pretrials objections. As Mr Herrera has been in full compliance of his pretrial condition. This drop off and pick up of his kids would only be for a limited time till the mother of the children is to recover from her surgery and resume her duties in dropping off and picking up the children from school.

Thank you for your time and attention in this matter.

Respectfully Submitted,
Charles Kaser
Attorney for the Defendant



By: /s/ *Charles Kaser*

CC: All Parties (via ECF)